

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Reassessment of Federal Communications	)	ET Docket No. 13-84
Commission Radiofrequency Exposure Limits and	)	
Policies	)	
	)	
Proposed Changes in the Commission's Rules	)	ET Docket No. 03-137
Regarding Human Exposure to Radiofrequency	)	
Electromagnetic Fields	)	
	)	

To: Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

Comment Filed by: Lawrence J Gust  
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805-644-2008

August 20, 2013

**AFFIDAVIT OF** (your name) LAWRENCE JAMES GUST

State of California

Ventura County

I, Lawrence James Gust, attest that my statements are true to the best of my knowledge.

**Comment** round for FCC ET Docket No. 013-84 and ET Docket No. 03-137

1. My name is Lawrence James Gust . My address is 211 S Brent St, Ventura, CA
2. I am an electrical engineer and a certified Building Biology Environmental Consultant.
3. My statement follows on pages 3 and 4

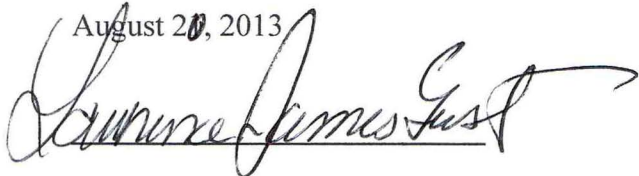
Respectfully submitted by

Lawrence James Gust

211 S. Brent St.

Ventura, CA, 93003

August 20, 2013



(your signature)

(should you so choose)

Sworn to before me

This 20 day of Aug, 2013

  
Notary Public



# GUST ENVIRONMENTAL

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Monday, August 19, 2013

Federal Communications Commission  
Washington, DC

Comments for Dockets - ET Docket No. 03-137 and ET Docket No. 13-84.

My name is Lawrence J. Gust, Ventura, CA. I am a degreed electrical engineer with an MBA. I have been an environmental consultant for 20 years working through doctors with patients suffering from multiple chemical sensitivities and electrical Hyper Sensitivity. In these cases the doctor believes that the patient's home plays a role in their illness or in their inability to respond to treatment.

I would like to remind the FCC of the Federal court's decision in In 1965, dealing with a this federal agency's responsibility to protect the environment (Scenic Hudson v. Federal Power Commission) in which the court said:

- If the Commission is properly to discharge its duty in this regards, the record on which it bases its determination must be complete. The petitioners and the public at large have a right to demand this completeness. It is our view, and we find, that the Commission has failed to compile a record which is sufficient to support its decision. The Commission has ignored certain relevant factors and failed to make a thorough study of possible alternatives . . .
- . . . the public is entitled to know on the record that no stone has been left unturned.
- The Commission of its own motion, should always seek to insure that a full and adequate record is presented to it.
- A regulatory commission can insure continuing confidence in its decisions only when it has used its staff and its own expertise in manner not possible for the uninformed and poorly financed public.
- The Commission must see to it that the record is complete. The Commission has an affirmative duty to inquire into and consider all relevant facts.

**Over my 20 year career in this field**, the instances of people with Electromagnetic Hyper Sensitivity Syndrome (EHS) has increased from nearly zero to more than 50% of my practice. There is no factor that can so fully account for this dramatic increase across such a broad population other than the increase in man-made electromagnetic radiation now millions of times greater than it was 20 years ago.

Just to be clear EHS is also referred to as Idiopathic environmental intolerance to electromagnetic fields. Sufferers of electromagnetic hypersensitivity report responding to non-ionizing electromagnetic fields (or electromagnetic radiation) at intensities well below the limits permitted by international radiation safety standards.

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Electrical Engineer

Certified Electromagnetic Radiation Safety Advisor

Certified Building Biological and Ecology Consultant

Member, National Electromagnetic Field Testing Association

Faculty and Board of the International Institute for Building Biology and Ecology, Inc.



The client reported symptoms of EHS include severe and frequent headache, fatigue, stress, sleep disturbances, skin symptoms like prickling, burning sensations and rashes, pain and ache in muscles, digestive disturbances and many other health problems. EHS symptoms are a real and sometimes disabling problem for the affected persons.

When I have been called into such cases, measurements of RF radiation has shown power density levels significantly below levels now set by FCC regulations. However, the power density levels in these cases are above levels described in peer reviewed research looking at cellular level affects of RF radiation. These studies are cited in the *2012 Bio-Initiative Report* which is appended to this statement.

Many of the patients I deal with had no history of sensitivity to chemicals or EMF including RF prior to the onset of some initial sensitizing RF event. These people led what would be described as normal lives in middle class and upper middle class surroundings. The most frequent initial sensitizing event over the last two years has been the installation of a power company smart meter.

The human dimension of EHS is tragic. I have people calling me in ever increasing numbers reporting the total change in their life circumstances and begging me for help to return to a normal life. These people are enduring enormous suffering. They have very painful, frequent headaches; they have burning skin; they have heart arrhythmia; they have pain in extremities; they have mental confusion; they have memory loss. They have lost their unalienable rights...

*"We hold these truths to be self-evident, that all men are created equal, that they are endowed by their Creator with certain unalienable Rights, that among these are Life, Liberty and the pursuit of Happiness.--That to secure these rights, Governments are instituted among Men, deriving their just powers from the consent of the governed."*

My clients are unable to work because places of employment are loaded with wireless devices. They are unable to drive to work because the roadways are flanked by cell phone towers irradiating passing vehicles with significantly high levels of RF compared to studies on cellular level effects. They are unable to live in urban and suburban areas of California as houses are being irradiated by ever increasing numbers of cell phone antennas, utility smart meters and neighbor's wireless devices.

**More to the point, when remediation was done to reduced RF radiation through shielding of the residence, symptoms were abated or reduced depending on the initial power density and the overall ability of the shielding plan to obtain significant reduction in RF. The ability to reduce RF enough to be effective is a costly process and economic constraints prevent many people from effecting the best remediation plan or any plan at all.**

Finally, I am greatly concerned about the 4G cell phone system as the frequencies envisioned for this service go as high as 8 GHz, more than four time the current maximum frequency. The four fold reduction in wave length will significantly reduce the effectiveness of some types of already installed shielding. This situation will adversely affect people who have already paid thousands of dollars for shield to provide themselves with some measure of relief from the health problem brought on by their original exposure.

Respectfully Submitted this 19<sup>th</sup> day of August, 2013,

Lawrence James Gust  
Ventura, CA